

JAN 21 2015  
US DISTRICT COURT  
WESTERN DISTRICT OF NIN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION

UNITED STATES OF AMERICA	)	Docket No. 3:15-cr- 20 -RJC
	)	
	)	<u>BILL OF INDICTMENT</u>
v.	)	
	)	Violations:
(1) JOSE OTONIEL REBOLLAR	)	18 U.S.C. § 2
(2) RICARDO REYNOSO REBOLLAR	)	18 U.S.C. § 924(c)
(3) JOSE DE JESUS MUNOZ	)	18 U.S.C. § 1956
(4) PABLO MUNOZ	)	18 U.S.C. § 1957
	)	21 U.S.C. § 841
	)	21 U.S.C. § 846
	)	

## THE GRAND JURY CHARGES:

COUNT ONE  
(Drug Trafficking Conspiracy)

From in or about 2011 to on or about December 18, 2014, in Mecklenburg County and Gaston County, within the Western District of North Carolina, and elsewhere, the Defendants,

(1) JOSE OTONIEL REBOLLAR  
(2) RICARDO REYNOSO REBOLLAR  
(3) JOSE DE JESUS MUNOZ  
(4) PABLO MUNOZ

did knowingly and intentionally conspire and agree with each other and with other persons, known and unknown to the Grand Jury, to distribute and to possess with intent to distribute controlled substances, that is, a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

Quantity of Cocaine Involved in the Conspiracy

It is further alleged that, with respect to the conspiracy offense charged in Count One, five (5) kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, are attributable to, and were reasonably foreseeable by Defendants (1) JOSE OTONIEL REBOLLAR, (2) RICARDO REYNOSO REBOLLAR, (3) JOSE DE JESUS MUNOZ, and (4) PABLO MUNOZ, so Title 21, United States Code, Section 841(b)(1)(A) is applicable to them.

**COUNT TWO**  
**(Money Laundering Conspiracy)**

From in or about 2011 to on or about December 18, 2014, in Mecklenburg County and Gaston County, within the Western District of North Carolina, and Montgomery County and Randolph County, within the Middle District of North Carolina, and elsewhere, the Defendant,

**(1) JOSE OTONIEL REBOLLAR,**

did knowingly combine, conspire, and agree with other persons, known and unknown to the Grand Jury, to commit offenses against the United States, to wit: to knowingly engage and attempt to engage, in monetary transactions by, through or to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, that is, the purchase of real property, such property having been derived from a specified unlawful activity, that is, the manufacture, importation, sale, or distribution of a controlled substance, in violation of Title 18, United States Code, Sections 1957 and 1956(h).

**COUNT THREE**  
**(Possession of Firearm in Furtherance of Drug Trafficking)**

On or about June 9, 2014, in Mecklenburg County and Gaston County, within the Western District of North Carolina, Randolph County, within the Middle District of North Carolina, and elsewhere, the Defendants,

**(1) JOSE OTONIEL REBOLLAR**  
**(3) JOSE DE JESUS MUNOZ**

in furtherance of a drug trafficking crime, that is, conspiracy to distribute and to possess with intent to distribute cocaine, a violation of Title 21, United States Code, Section 846, as charged in Count One, for which he may be prosecuted in a court of the United States, did knowingly and unlawfully possess one or more firearms, and did aid and abet the same, all in violation of Title 18, United States Code, Sections 924(c) and 2.

**COUNT FOUR**  
**(Possession with Intent to Distribute Cocaine)**

On or about December 18, 2014, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, the Defendants,

**(1) JOSE OTONIEL REBOLLAR**  
**(2) RICARDO REYNOSO REBOLLAR**

did knowingly and intentionally possess with intent to distribute controlled substances, that is, a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and did aid and abet the same.

Said offense involved five hundred (500) grams or more of a mixture and substance containing a detectable amount of cocaine.

All in violation of Title 21, United States Code, Section 841(b)(1)(B), and Title 18, United States Code, Section 2.

**COUNT FIVE**  
**(Possession of Firearm in Furtherance of Drug Trafficking)**

On or about December 18, 2014, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, the Defendant,

**(1) JOSE OTONIEL REBOLLAR,**

in furtherance of a drug trafficking crime, that is, possession with intent to distribute cocaine, a violation of Title 21, United States Code, Section 841, as charged in Count Four, for which he may be prosecuted in a court of the United States, did knowingly and unlawfully possess one or more firearms, and did aid and abet the same, all in violation of Title 18, United States Code, Sections 924(c) and 2.

**COUNT SIX**

**(Possession of Firearm in Furtherance of Drug Trafficking)**

On or about December 18, 2014, in Mecklenburg County and Gaston County, within the Western District of North Carolina, Randolph County, within the Middle District of North Carolina, and elsewhere, the Defendant,

**(2) RICARDO REYNOSO REBOLLAR,**

in furtherance of a drug trafficking crime, that is, conspiracy to distribute and to possess with intent to distribute cocaine, a violation of Title 21, United States Code, Section 846, as charged in Count One, for which he may be prosecuted in a court of the United States, did knowingly and unlawfully possess one or more firearms, and did aid and abet the same, all in violation of Title 18, United States Code, Sections 924(c) and 2.

**COUNT SEVEN**

**(Possession of Firearm in Furtherance of Drug Trafficking)**

On or about December 18, 2014, in Mecklenburg County and Gaston County, within the Western District of North Carolina, Randolph County, within the Middle District of North Carolina, and elsewhere, the Defendant,

**(4) PABLO MUNOZ,**

in furtherance of a drug trafficking crime, that is, conspiracy to distribute and to possess with intent to distribute cocaine, a violation of Title 21, United States Code, Section 846, as charged in Count One, for which he may be prosecuted in a court of the United States, did knowingly and unlawfully possess one or more firearms, and did aid and abet the same, all in violation of Title 18, United States Code, Sections 924(c) and 2.

### **NOTICE OF FORFEITURE AND FINDING OF PROBABLE CAUSE**

Notice is hereby given of 21 U.S.C. § 853, 18 U.S.C. § 982, and 28 U.S.C. § 2461(c). The following property is subject to forfeiture in accordance with Section 853, 924, and/or 2461(c):

- a. All property which constitutes or is derived from proceeds of the violations set forth in this bill of indictment;
- b. All property used or intended to be used in any manner or part to commit or facilitate such violations;
- c. All firearms or ammunition involved or used in such violations; and
- d. If, as set forth in 21 U.S.C. § 853(p), any property described in (a), (b), and (c) cannot be located upon the exercise of due diligence, has been transferred or sold to, or deposited with, a third party, has been placed beyond the jurisdiction of the court, has been substantially diminished in value, or has been commingled with other property which cannot be divided without difficulty, all other property of the defendant/s to the extent of the value of the property described in (a), (b), and (c).

The Grand Jury finds probable cause to believe that the following property is subject to forfeiture on one or more of the grounds stated above:

- A forfeiture money judgment in the amount of at least \$2,000,000, such amount constituting the proceeds of the violations set forth in this Bill of Indictment.
- United States currency, firearms, and ammunition seized during the investigation on December 18, 2014.
- The following amounts of U.S. currency seized by earlier seizure warrants from the following Fidelity bank accounts:

xxxx2485	\$	84.41
xxxx7390	\$	8,279.98
xxxx6108	\$	22,067.03
xxxx1370	\$	9,522.06
xxxx0509	\$	25,129.38
xxxx7648	\$	632.02
xxxx2840	\$	1,012.38

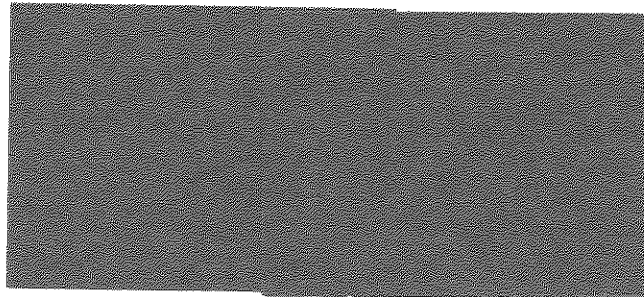
- The following amounts of U.S. currency seized by earlier seizure warrants from the following Wells Fargo bank accounts:

xxxx8906	\$	410.12
xxxx6707	\$	1,144.22
xxxx0734	\$	1,683.30
xxxx0746	\$	1,520.13
xxxx0509	\$	25,129.38
xxxx7648	\$	632.02
xxxx2840	\$	1,012.38

- The real property located at 314 Church Street, Montgomery County, Biscoe, North Carolina.
- The real property located at 1011 Chamberlin Drive, Randolph County, Asheboro, North Carolina.
- The real property located at 413 South Whiskey, Montgomery County, Candor, North Carolina.
- The real property located at 110 E. Main Street, Montgomery County, Biscoe, North Carolina.
- The real property located at 344 Windy Lane, Montgomery County, Candor, North Carolina.
- The real property located at 406 Blake Street (two tracts), Montgomery County, Biscoe, North Carolina.
- The real property located at 331 Oak Street, Montgomery County, Eagle Springs, North Carolina.
- The real property located at 711 West Kivett Street, Randolph County, Asheboro, North Carolina.
- The real property located at 502 Columbia Avenue, Randolph County, Ramseur, North Carolina.
- The real property located at 631 Peachtree Street, Randolph County, Asheboro, North Carolina.
- The real property located at 701 Glenwood Road, Randolph County, Asheboro, North Carolina.
- The real property located at 1509 Old Farmer Road (lots 85 and 86), Randolph County, Asheboro, North Carolina.
- The real property located at 1511 Old Farmer Road (lots 81, 82, 83, and 84), Randolph County, Asheboro, North Carolina.

- The real property comprising approximately two tracts containing .13 acres and .14 acres, Montgomery County, Biscoe; book/page: 691/211-212.
- The real property comprising approximately .51 acres located in Montgomery County, Biscoe; book/page: 633/809-810.
- The real property comprising approximately 23.06 acres located on Tarry Church Road, Moore County; book/page: 3687/335.
- The real property comprising approximately 54.842 acres in Rocky Springs Township, Montgomery County (book/page: 595/35-38), Eagle Springs, North Carolina.
- The real property comprising approximately 61.643 acres in Rocky Springs Township, Montgomery County (book/page: 709/370-380), Eagle Springs, North Carolina.

A TRUE BILL:



ANNE M. TOMPKINS  
UNITED STATES ATTORNEY



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STEVEN R. KAUFMAN  
ASSISTANT UNITED STATES ATTORNEY